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VIA ELECTRONIC MAIL & FEDERAL EXPRESS

August 22, 2008

Monica Desai
Chief, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Dear Ms. Desai:

I am replying to your letter to Steve Morris, CEO of Arbitron Inc. ("Arbitron"), dated July 17, 2008. Thank you for agreeing to accept this letter by today's date.

Arbitron appreciates this opportunity to provide additional information to the Federal Communications Commission (the "FCC") regarding Arbitron's Portable People Meter ("PPM") methodology and its implementation in the Top 50 advertising markets in the United States. As you know, Arbitron participated in the Commission's July 29, 2008 En Banc Hearing focusing on the challenges confronting minority broadcasters in overcoming barriers to communications financing. The transcript of remarks of Mr. Morris, at that forum are appended as Attachment 1 to this letter. Arbitron also appeared before the FCC's Advisory Committee on Diversity for Communications in the Digital Age (the "Advisory Committee") on July 28, 2008.

Arbitron is committed to working collaboratively and constructively with the Commission and all stakeholders, particularly the advertising and broadcasting industries and especially minority and Spanish-language broadcasters, to ensure that the PPM™ methodology provides the most reliable possible data regarding radio broadcast audience estimates. Radio needs the electronic audience measurement that the PPM methodology provides to help ensure that it remains competitive in an increasingly digital media universe.

The PPM methodology is unquestionably a superior tool to the paper-and pencil method for audience measurement. By passively and objectively recording panelists' exposure to radio signals, it provides enhanced reliability when compared to the recall and manual recording called for by the diary methodology. The PPM represents a carefully developed response over a sixteen-year period to the demands of the advertising and broadcasting industries for audience estimates based upon the listener's exposure to a broadcast. The PPM Fact Sheet (Attachment

2) and the document "Differences Between Diary-Based and Electronic Measurement" (Attachment 3) elaborate on the reasons why the PPM methodology is superior.

Arbitron recognizes, however, that the introduction of PPM technology, as is so often the case with new technology, has the potential to be disruptive, certainly on a short-term basis. In that regard, Arbitron is listening intently to the concerns raised by some minority and Spanish-language broadcasters that the switch from the diary method to the PPM method is having a disproportionate impact upon them and their audiences, sometimes (as is the case with most broadcasters) reflected in decreases in their ratings. Arbitron is committed to continuing to work with minority and Spanish-language broadcasters. As the radio industry's preferred vendor, we consider ourselves a steward of the radio industry and we care greatly about the success of radio broadcasters, especially the broadcasters targeting minority and Spanish-language audiences.

To that end, Arbitron is engaged in ongoing review and, where appropriate, enhancement of its sampling methodology. As discussed in greater detail in Attachment 4 to this letter, Arbitron's PPM panels are representative of minorities and young adults. Indeed, Black, Hispanic and young adults' proportionality, using sample targets based on U.S. census data, are, on average, higher for the PPM service than they were for the diary service. Moreover, Arbitron is engaged in a number of special initiatives designed to enhance minority and young adult representation, including increasing the sampling rate, inclusion of cell-phone only households and recruitment and performance bonuses, all described more fully in Attachment 5. Additionally, as described in Attachments 6 and 7, Arbitron is engaged in targeted outreach to Black, Hispanic and Spanish-language radio constituencies and grassroots organizations to explain the PPM service and to assist broadcasters serving these audiences in making PPM data work for them.

Perhaps the best example of how Arbitron's cooperation with minority broadcasters can work to their advantage is in Houston. The number 1 and 2 rated stations in that market, both Urban-formatted and majority-owned by Blacks, initially experienced a significant ratings decline after commercialization of the PPM methodology. However, within 9 months they had rebounded back to number 1 and 2 in that market. The Radio and Records article, "Mega Recipe for Success" (Attachment 8), describes how a Houston Spanish-language station made PPM data work for its benefit. Arbitron renews its pledge to work with minority and Spanish-language broadcasters and advertisers to help ensure a positive PPM outcome.

Finally, Arbitron is compelled to address the FCC's lack of jurisdiction over Arbitron's operations and assets, as well as the PPM service, and the related question of the possible initiation of an investigation under Section 403 of the Communications Act of 1934, as amended, as has been recommended by the Advisory Committee. Some historical context is helpful.

Concerns about the accuracy and potential discriminatory impact of audience measurement tools are not new. More than one-half century ago, decades before invention of the PPM technology, congressional hearings concluded that government regulation of broadcast audience measurement activities was not advisable. Instead, a House Subcommittee recommended industry self-regulation. This recommendation was the catalyst for creation of the Media Rating

Council ("MRC"), a self-regulatory organization composed of industry marketers and media organizations, including a number of minority broadcast station owners.

The MRC does not require accreditation prior to commercialization. Instead, the industry norm is to commercialize prior to accreditation but after a third party audit (the results of which are reviewed by the MRC) and publication of the data in a pre-currency mode. As George Ivie's remarks before the FCC's En Banc Hearing (Attachment 9 hereto) indicated, the findings of the audit, details of the MRC review process and communications between the MRC and Arbitron are confidential. It is noteworthy, however, that Mr. Ivie testified that "... a broad industry consensus exists that electronic measurement such as that enabled by Arbitron's PPM technology is a significant step forward in terms of capturing listener exposure, ..." and that while electronic measurement may not be perfect, "... it is broadly considered better than the current hand-written, recall-based diary technique when implemented properly." Mr. Ivie also testified that the two techniques (diary versus PPM method) measure very differently, and therefore audience changes do occur purely as a result of measurement mode.

A minority broadcast organization unsuccessfully sought to involve the FCC in the area of audience measurement almost 30 years ago, again long before the advent of the PPM technology. Concerned about its apparent lack of jurisdiction, the FCC declined to conduct a Section 403 investigation into allegations that ratings services do not accurately estimate the audiences of minority-programmed stations.

Today, as was the case some thirty years ago, there is no basis for assertion of FCC jurisdiction over Arbitron or its audience measurement activities. Derivatively, there is no lawful basis for initiating a Section 403 investigation, as there is no underlying FCC jurisdiction. Section 403 investigations, adversarial in nature, have historically been used in circumstances involving allegations of egregious unethical or illegal conduct by licensees such as greenmailing, fraudulent license applications, etc. A Section 403 investigation has no place here.

Instead, Arbitron assures the Commission that it intends to continue to work within the MRC's self-regulatory process. Arbitron has received accreditation in Houston, Texas. Although initially denied accreditation in Philadelphia, a new audit was conducted in 2008 that is currently under MRC review. Arbitron remains committed to seeking accreditation in Philadelphia and other markets. At the same time, Arbitron will continue to review and, where appropriate, enhance its methodology in accordance with the MRC's requirement of continuous improvement, sensitive to the concerns of minority and Spanish-language broadcasters as well as other broadcasters and advertisers.

Attached are some background materials which serve to provide a greater understanding of the methodology and the assistance Arbitron is providing the industry in the transition to PPM methodology. More specifically, the materials are:

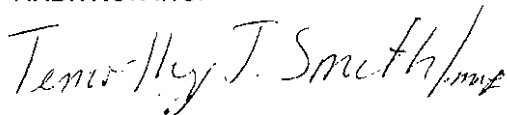
1. Transcript of Remarks of Steve Morris – FCC En Banc Hearing, July 29th – Schomburg Center for Research in Black Culture;

2. PPM Fact Sheet – An earlier version of this document was provided to the Commissioners and panelists on the second panel during the FCC En Banc Hearing on July 29th;
3. Differences Between Diary-Based and Electronic Measurement – An earlier version of this document was provided to the Commissioners and panelists on the second panel during the FCC En Banc Hearing on July 29th;
4. Minority and Young Adult Representation in PPM;
5. Minority and Young Adult PPM Initiatives;
6. Report on PPM Research Questions from Hispanic Radio Broadcasters – This document was prepared for a meeting on June 6, 2008 with Univision Communications Inc., Spanish Broadcasting System, Inc., Border Media Partners, and Entravision Communications Corporation, and responds to a list of questions submitted in advance of that meeting;
7. PPM Outreach Efforts – This document is a brief summary of Arbitron's special efforts to reach Urban, Hispanic and Spanish-language dominant radio constituencies and grassroots organizations;
8. Radio and Records article, "Mega Recipe for Success," August 8, 2008 (reprinted with permission); and
9. Statement of George Ivie, Executive Director of the MRC, as prepared for delivery to the FCC's En Banc hearing on July 29th.

Please contact me should you have any questions concerning this letter and the attached materials.

Sincerely,

ARBITRON INC.



Timothy T. Smith
Executive Vice President & Chief Legal Officer

Cc: Mania Baghdadi, Media Bureau
Lawrence Sidman, Paul Hastings
John Johnson, Paul Hastings

Statement of Steve Morris of Arbitron, Inc.
FCC En Banc Hearing on Overcoming Barriers to Communications Financing
July 29, 2008
Schomburg Center, Langston Hughes Auditorium
New York, New York

Good afternoon, Mr. Chairman and Commissioners. I hope this subject isn't that hot, but it's possible that it is. My name is Steve Morris. I'm Chairman and CEO of Arbitron. I want to thank you for the opportunity to appear before you to discuss our Portable People Meter and its contribution to the continued economic viability of radio in a rapidly-evolving media landscape.

I need to say for the record that while we're happy to participate in forums such as this one, serious questions have been raised as to the FCC's jurisdiction over our company. I'm not a lawyer, so I'm going to leave this subject to others to work through, but my appearance here today should not be construed as submitting to the Commission's jurisdiction or waiving any of our company's rights.

Having said that, I will also say that as a company we welcome the opportunity to talk to all of our customers, and we do in great depth; we have with NABOB, and with Spanish broadcasters. There is no issue of secrecy as to the numbers, we talk to the MRC at great length, so there is a great deal of knowledge about what we do. The question is only one of jurisdiction.

From the perspective of the long-term health of the industry, radio is in danger of being left behind as one of the last major media without electronic audience measurement. At this critical juncture, PPM can help ensure radio's competitive position by providing desperately-needed accountability to advertisers with objective, granular, and timely data. The economic reality is that unless radio adopts portable passive measurement, it runs the risk of losing further advertising dollars to other media which have advanced well beyond the paper-and-pencil diary method.

I would also add, in a positive vein, that as radio races to participate in online audio entertainment, PPM is going to begin to report combined off-line and online audiences in about three weeks. This capability does not exist today in the diary, and realistically the diary will always be challenged to measure the complexity of streaming audio. With the combined audiences displayed in our reports, radio will have the opportunity to monetize these streams as new revenue, which is exciting indeed, especially in the context of the focus of this conference. Erin, I would note that this technology is extendable to the third screen, so we see this as having legs well down the road as well, as radio continues to expand its vehicles for distribution.

PPM is superior to the diary on virtually every criterion. Our PPM panels exceed their sample targets and the performance in the diary representation of Blacks and

Hispanics. There is not a representation issue. PPM passively and objectively records panelists' exposure to radio signals, and it is therefore free of the potential distortion when measurement is based on memory, as it is in the diary. PPM panels also provide far more days of measurement from each panel, and hence enjoy equally or higher statistical reliability versus the diary.

PPM affects all radio broadcasters. The question is the ability on the part of the broadcasters to effectively use this valuable information. In Houston, our first commercialized PPM market, after initially suffering a ratings decrease, by programming changes the number 1 and number 2 stations are there once again, both Urban-formatted stations owned by Radio One, a prominent black-owned broadcaster.

We do recognize that the introduction of new and improved technology can be disruptive, and we've made special efforts to assist minority broadcasters in making the transition from paper diaries to electronic measurement, above and beyond the efforts that we've made for our general market customers. These include, for example, studies that Arbitron has commissioned from Arizona State University's Center for Community Development and Civil Rights, and Howard University's School of Communications. These studies will help us to identify the best methods to adapt PPM into the Black and Hispanic communities. At the suggestion of a NABOB member, Arbitron engaged Equals 3 Communications, a minority-owned business specializing in multicultural messaging and targeting of young populations, to review our recruitment and compliance methodology aimed at Black and Hispanic households. We expect to incorporate many of their suggestions as part of our ongoing process of PPM enhancement.

In closing, we want to reinforce the fact that Arbitron is an independent research company that strives to serve the needs of all stakeholders, including the advertising community and the radio broadcast industry. As such, we must be careful to maintain objectivity and strict adherence to the principles of neutral, scientific measurement of radio consumer behavior. We believe that PPM represents a significant advancement that is consistent with our role as an innovator and a leader in the field of audience measurement.

Thanks very much.

PPM™ FACT SHEET

PPM vs. Diary:

- In 1988 the Committee on Local Radio Audience Measurement (COLRAM) of the National Association of Broadcasters recommended that Arbitron focus on “exposure” as the measure that was to be captured and reported by the radio audience measurement process.
 - The current Arbitron radio diary instructs respondents to write down all the radio they “hear”, no matter who chooses the station.
 - The diary instrument is a subjective method which relies on respondent recall of their exposure, in contrast to the PPM device which is an objective and electronic measure of actual exposure to encoded stations.
- The new PPM methodology provides a superior method to capture radio exposure.
 - The PPM system is the most tested electronic measurement system in the world.
 - PPM data offer the advertising industry greater accountability, due to the reliability of the PPM device in capturing actual exposure.

Representation of Minorities in PPM Panels:

- PPM sample size targets for demographic and minority groups are derived from U.S. Census-based data. Currently PPM samples in most markets exceed the defined sample size targets for Black, Hispanic and Spanish-dominant panelists.
- Furthermore, the percentages of Black, Hispanic and Spanish-dominant panelists included in PPM panels are generally proportionate to the percentages of the Black, Hispanic and Spanish-dominant persons in the population, and in fact in many markets minorities are over-represented in PPM panels.
- Arbitron offers specialized incentives and culturally attuned materials to Black, Hispanic and Spanish-dominant households to engender their trust and participation in the PPM survey.
 - These include enhanced monetary incentives (2-4 times the standard amounts in many cases); bilingual written materials, interviewers and panel relations staff for Hispanic households; a youth-oriented Website to maintain interest and motivation levels among younger minority panelists; and special decals and carry accessories that permit panelists to personalize and customize the look of their PPM devices.

PPM Data Reaffirms Audience Loyalty:

- The PPM methodology generates a quantitative measure of the amount of time a person is exposed to a given station.
- PPM data confirm that Black and Hispanic audiences are extremely loyal to radio stations

targeted directly to them and thus represent an attractive media opportunity to advertisers and agencies targeting minority consumers.

- PPM methodology produces audience estimates that are different than the diary and defines a new audience reality for radio stations and agencies/advertisers:
 - People listen to more stations on more occasions than previously reported in the diary, and
 - People listen for shorter periods of time.
- In markets where PPM methodology has been introduced, many broadcasters are learning from the data, and executing new programming and marketing strategies designed to optimize ratings results for an electronic meter rather than a diary methodology. Anecdotally, there are many examples of success in improving initial ratings results, based on use of PPM data.
- Among the many tests Arbitron has undertaken leading up to the commercialization of PPM methodology was a study in which a group of respondents were asked to carry a PPM device after having been loyal diary-keepers in a previous diary-based survey.
 - From this sample, evidence was gathered to confirm that the recall factor reports the prominent station listened to, generally rounding up listening to that station at the expense of reporting exposure incidents to other stations throughout the day.
- An independent third party source of radio ad sales transactions (SQAD) demonstrates that the cost of an advertising purchase on a per ratings basis (cost per point) has increased in Houston and Philadelphia since the transition to PPM data.

Differences Between Diary-Based And Electronic Measurement

Small, portable electronic meters such as PPM™ devices have several obvious advantages over diaries and recall interviews for measuring radio exposure. When worn or carried all day as instructed, they virtually eliminate human reporting error. They provide a more precise record of which stations respondents actually were exposed to and for how long, as compared to diary or other recall methods.

In recall methods, respondents will report only the more memorable listening occasions; they tend to round start and stop times, smooth over interruptions in listening and sometimes report typical rather than actual listening. In a radio recall study conducted by Arbitron in 2003 with 1,493 respondents across the top 100 DMA's (defined markets), respondents acknowledged that for nearly one-third (32.8%) of reported radio episodes, they could not actually hear the radio the entire time. Electronic measurement will pick up these interruptions in radio exposure that people do not report in recall methodologies.

Consistent with these expected effects, PPM data show that radio listeners:

- Have 60% more episodes of radio listening each week than reported in diary, but each listening episode is about half as long as reported in diary
- Listen to about 60% to 70% more stations per week than reported in diary
- Have listening start times that are spread equally throughout the duration of a clock hour, whereas diary data show about 50% of listening episodes starting at the top of the hour

Respondents Tend to Over-Report Habitual Listening and More Salient Events

With self-report methods, some respondents will tend to report "typical" rather than actual behavior. This tendency can be exacerbated if the respondent feels a strong connection or loyalty to the program or personality to which he or she typically listens. So if a respondent typically listens to a specific morning show every weekday morning, but missed one day that week due to an illness or other change in schedule, he or she might still report listening every day in a self-report method, since that represents their "normal" listening. Because electronic measurement will detect every time that a change in routine disrupts "normal" listening, it is likely to show that actual listening to these types of programs is less than reported in self-report methods.

Comparisons of PPM and Diary Results for the Same Sample of People Help to Illustrate Why These Survey Instruments Produce Different Ratings

To explore the differences in listening results that are seen between PPM and Diary, we conducted a test in Philadelphia. In this test, we sent former PPM panelists a weekly radio diary to record their listening. The listening that this sample reported in their diaries was compared to their listening as reported by their PPM devices one year earlier. Since this comparison was for the same people, differences in sample representation could not be driving any of the listening differences seen. When comparing diary and PPM results for the same people, the same patterns of differences between PPM and Diary are seen.

- The PPM data showed 72% more episodes of radio listening each week than reported in the diary (28.5 versus 16.6) but each listening episode was roughly half as long as reported in the diary (36 minutes versus 83 minutes).
- The PPM showed about twice as many stations as reported in the diary (6.3 versus 3.1).

- The PPM showed listening start times that were spread equally across the clock quarter-hours, compared to the diary data in which nearly half (45%) of the episodes started at the top of the hour.
- This test provided confirmation that the differences between PPM and Diary are not driven by differences in sample representation, but are the result of instrument differences and the increased precision provided by electronic measurement as compared to a recall-based diary.

Self-Reporting is Particularly Challenging for the Heaviest Listeners

Since heavier listeners have more details to remember and record, and more opportunities for short interruptions and station changes, self-reporting is particularly challenging for them as shown in the example provided below. This is diary and PPM data from the *same person*, one year apart, and it provides an excellent illustration of the expected differences between diary-based and electronic measurement.

Diary and PPM Data from Same Person (White Male) One Year Apart

Diary - Winter 2004							
	Mon	Tue	Wed	Thu	Fri	Sat	Sun
6:00:00 AM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM		
6:15:00 AM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM		
6:30:00 AM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM		
6:45:00 AM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM		
7:00:00 AM	WSNI-FM	WSNI-FM	WSNI-FM	WSNI-FM	WSNI-FM		
7:15:00 AM	WSNI-FM	WSNI-FM	WSNI-FM	WSNI-FM	WSNI-FM		
7:30:00 AM							
7:45:00 AM							
8:00:00 AM							
8:15:00 AM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM		
8:30:00 AM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM		
8:45:00 AM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM		
9:00:00 AM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM		
9:15:00 AM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM		
9:30:00 AM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM		
9:45:00 AM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM		
10:00:00 AM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM		
10:15:00 AM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM		
10:30:00 AM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM		WXTU-FM
10:45:00 AM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM		
11:00:00 AM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM		
11:15:00 AM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM		
11:30:00 AM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM		
11:45:00 AM	WBEB-FM	WBEB-FM	WBEB-FM	WOGL-FM	WOGL-FM		
12:00:00 PM	WBEB-FM	WBEB-FM	WBEB-FM	WOGL-FM	WOGL-FM		

PPM - Winter 2003							
	Mon	Tue	Wed	Thu	Fri	Sat	Sun
6:00:00 AM		WBEB-FM		WBEB-FM	WBEB-FM	WBEB-FM	
6:15:00 AM		WBEB-FM		WBEB-FM	WBEB-FM	WBEB-FM	
6:30:00 AM		WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM	WBEB-FM	
6:45:00 AM		WBEB-FM		WBEB-FM	WBEB-FM	WBEB-FM	
7:00:00 AM		WBEB-FM		WBEB-FM	WBEB-FM	WBEB-FM	
7:15:00 AM		WOGL-FM		WSNI-FM	WXTU-FM	WOGL-FM	
7:30:00 AM		WOGL-FM	WBEB-FM	WSNI-FM	WOGL-FM	WOGL-FM	
7:45:00 AM		WOGL-FM	WSNI-FM	WSNI-FM	WOGL-FM	WOGL-FM	
8:00:00 AM		WPHI-AM	WSNI-FM	WSNI-FM	WOGL-FM	WOGL-FM	
8:15:00 AM		WOGL-FM	WSNI-FM	WSNI-FM	WSNI-FM	WSNI-FM	
8:30:00 AM	WBEB-FM	WSNI-FM	WSNI-FM	WSNI-FM	WSNI-FM	WSNI-FM	
8:45:00 AM	WBEB-FM	WSNI-FM	WSNI-FM	WSNI-FM	WSNI-FM	WSNI-FM	WBEB-FM
9:00:00 AM	WBEB-FM	WSNI-FM	WSNI-FM	WSNI-FM	WSNI-FM	WSNI-FM	WBEB-FM
9:15:00 AM	WBEB-FM	WSNI-FM		WSNI-FM	WSNI-FM	WSNI-FM	WBEB-FM
9:30:00 AM	WBEB-FM	WSNI-FM				WSNI-FM	WBEB-FM
9:45:00 AM	WBEB-FM	WSNI-FM					WBEB-FM
10:00:00 AM			WSNI-FM				WBEB-FM
10:15:00 AM	WBEB-FM	WSNI-FM					
10:30:00 AM	WSNI-FM	WSNI-FM		WSNI-FM			
10:45:00 AM	WSNI-FM			WSNI-FM		WSNI-FM	
11:00:00 AM	WSNI-FM			WSNI-FM	WSNI-FM		
11:15:00 AM				WSNI-FM		WSNI-FM	
11:30:00 AM				WSNI-FM		WSNI-FM	WTMR-FM
11:45:00 AM						WSNI-FM	
12:00:00 PM						WSNI-FM	

In the Diary, this person reports similar radio listening for each weekday. The PPM data show a much more varied picture. The PPM data also show:

- More stations listened to (6 vs. 4)
- More than twice as many episodes (26 vs. 18)
- Each individual episode is 39% shorter (57 minutes vs. 93 minutes)

Below is another comparison of diary and PPM entries from the same person, one year apart, this time from a Black male.

Diary and PPM Data from Same Person (Black Male) One Year Apart

Diary - Winter 2004						PPM - Winter 2003					
	Mon	Tue	Wed	Thu	Fri		Mon	Tue	Wed	Thu	Fri
6:00:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	6:00:00 AM			WIP-AM		
6:15:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	6:15:00 AM	WIP-AM	WIP-AM	WIP-AM		WIP-AM
6:30:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	6:30:00 AM	WIP-AM	WIP-AM	WIP-AM		WIP-AM
6:45:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	6:45:00 AM	WIP-AM	WIP-AM	WIP-AM		WIP-AM
7:00:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	7:00:00 AM		WIP-AM	WIP-AM	WIP-AM	WIP-AM
7:15:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	7:15:00 AM		WIP-AM	WIP-AM	WIP-AM	WIP-AM
7:30:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	7:30:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM
7:45:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	7:45:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM
8:00:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	8:00:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM
8:15:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	8:15:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM
8:30:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	8:30:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM
8:45:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	8:45:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM
9:00:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	9:00:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM
9:15:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	9:15:00 AM		WIP-AM	WIP-AM	WIP-AM	WIP-AM
9:30:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	9:30:00 AM		WIP-AM	WIP-AM	WIP-AM	KYW-AM
9:45:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	9:45:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	
10:00:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	10:00:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	
10:15:00 AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	10:15:00 AM	WIP-AM	WIP-AM		WIP-AM	
10:30:00 AM		WIP-AM	WIP-AM	WIP-AM	WIP-AM	10:30:00 AM	WIP-AM	WIP-AM		WIP-AM	
10:45:00 AM		WIP-AM	WIP-AM	WIP-AM	WIP-AM	10:45:00 AM	WIP-AM	WIP-AM		WIP-AM	KYW-AM
11:00:00 AM	WDAS-FM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	11:00:00 AM		WIP-AM	WIP-AM	WIP-AM	KYW-AM
11:15:00 AM	WDAS-FM	WIP-AM	WIP-AM	WIP-AM	WIP-AM	11:15:00 AM		WIP-AM		WIP-AM	KYW-AM
11:30:00 AM	WDAS-FM	WIP-AM			WIP-AM	11:30:00 AM		KYW-AM		WIP-AM	KYW-AM
11:45:00 AM	WDAS-FM	WIP-AM			WIP-AM	11:45:00 AM		KYW-AM	WIP-AM	WIP-AM	KYW-AM
12:00:00 PM	WDAS-FM	WDAS-FM	WDAS-FM	WDAS-FM		12:00:00 PM			WIP-AM		WIP-AM
12:15:00 PM	WDAS-FM	WDAS-FM	WDAS-FM	WDAS-FM	WDAS-FM	12:15:00 PM				WDAS-FM	WIP-AM
12:30:00 PM		WDAS-FM	WDAS-FM	WDAS-FM	WDAS-FM	12:30:00 PM		KYW-AM	WIP-AM		WIP-AM
12:45:00 PM		WDAS-FM	WDAS-FM	WDAS-FM	WDAS-FM	12:45:00 PM					WIP-AM
1:00:00 PM	WIP-AM	WDAS-FM	WDAS-FM	WDAS-FM	WDAS-FM	1:00:00 PM			WIP-AM	WDAS-FM	WIP-AM
1:15:00 PM	WIP-AM	WDAS-FM	WDAS-FM	WDAS-FM	WDAS-FM	1:15:00 PM			WIP-AM	WDAS-FM	WIP-AM
1:30:00 PM	WIP-AM	WDAS-FM	WDAS-FM	WDAS-FM	WDAS-FM	1:30:00 PM	WIP-AM		WIP-AM	WDAS-FM	WIP-AM
1:45:00 PM	WIP-AM	WDAS-FM	WDAS-FM	WDAS-FM	WDAS-FM	1:45:00 PM	WIP-AM	KYW-AM	WIP-AM	WDAS-FM	WIP-AM
2:00:00 PM	WIP-AM	WDAS-FM	WDAS-FM	WDAS-FM	WDAS-FM	2:00:00 PM	WIP-AM	KYW-AM		WDAS-FM	WIP-AM
2:15:00 PM	WIP-AM	WDAS-FM	WDAS-FM	WDAS-FM	WDAS-FM	2:15:00 PM	WIP-AM			WDAS-FM	WIP-AM
2:30:00 PM	WIP-AM	WDAS-FM	WDAS-FM	WDAS-FM	WDAS-FM	2:30:00 PM	WIP-AM	WIP-AM		WDAS-FM	WDAS-FM
2:45:00 PM	WIP-AM	WDAS-FM	WDAS-FM	WDAS-FM	WDAS-FM	2:45:00 PM			WIP-AM	WDAS-FM	WDAS-FM
3:00:00 PM	WIP-AM	WDAS-FM	WDAS-FM	WDAS-FM	WDAS-FM	3:00:00 PM			WIP-AM	WDAS-FM	WDAS-FM
3:15:00 PM	WIP-AM	WDAS-FM	WDAS-FM	WDAS-FM	WDAS-FM	3:15:00 PM			WJZZ-FM	WDAS-FM	WDAS-FM
3:30:00 PM	WIP-AM	WDAS-FM	WDAS-FM	WDAS-FM	WDAS-FM	3:30:00 PM	WIP-AM	WIP-AM	WJZZ-FM	WDAS-FM	
3:45:00 PM	WIP-AM	WDAS-FM	WDAS-FM	WDAS-FM	WDAS-FM	3:45:00 PM			WJZZ-FM	WDAS-FM	
4:00:00 PM	WIP-AM	WDAS-FM	WDAS-FM	WDAS-FM	WDAS-FM	4:00:00 PM			WJZZ-FM		
4:15:00 PM	WIP-AM	WDAS-FM	WDAS-FM	WDAS-FM	WDAS-FM	4:15:00 PM			WJZZ-FM		
4:30:00 PM	WIP-AM	WDAS-FM	WDAS-FM	WDAS-FM	WDAS-FM	4:30:00 PM	WIP-AM		WJZZ-FM		

In the diary, this person reports virtually identical radio listening for each weekday. The PPM data show a much more varied picture:

- 100% more stations listened to (4 vs. 2)
- 44% more episodes (27 vs. 11)
- Each individual episode is 71% shorter (82 minutes vs. 211 minutes)

What Is The Value of the More Granular and Timely PPM Data?

The granularity of the PPM data, along with the robust daily sample sizes provided by the PPM panel design, support a level of analysis that is not possible with the diary methodology. Examples of analyses that can be done with PPM data that cannot be supported by diary data include:

- Impact of specific contests and promotions
- Impact of specific guests or one-time events, such as sports game broadcasts
- Program flow analyses to determine when listeners are tuning in and out
- Ability to react to results on a weekly and monthly basis, rather than on a quarterly basis

Two Urban formatted radio stations in Houston that saw a drop in rankings with the introduction of PPM methodology were able to use the PPM data to determine what changes to programming (e.g. restructuring commercial breaks) were needed to attract more listeners, and these stations have regained their pre-PPM rank positions.

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Minority and Young Adult Representation in PPM™ Data

Arbitron uses two key metrics to track performance in the representation of minorities and young adults in its samples: Designated Delivery Index, or “DDI”, and Proportionality.

Designated Delivery Index

PPM in-tab sample delivery is measured by the Designated Delivery Index (DDI), in which the number of panelists delivered is expressed as a percentage of the target number of participants. In-tab means a person who qualifies for inclusion in the ratings based on wearing the meter for the required number of hours per day (minimum 8+ hours for adults and 5+ hours for children 6-17 years of age). PPM sample targets are set, based on U.S. Census population estimates updated annually by Arbitron’s vendor, Claritas.

In general, both minority and young adult (Persons 18-34) PPM representation exceeds that of the diary service. Based on June 2008 data, averaged across 10 markets, Arbitron’s PPM panels are:

- Exceeding Black sample targets by 10%
- Exceeding Hispanic sample targets by 17%
- Exceeding Spanish-Dominant sample targets by 30%

Arbitron has set a benchmark to deliver at least a 70 DDI for young adults in the first six months of the panel, at least 75 in the second six months, and an 80 DDI in the second year of the panel. This benchmark goal applies to Persons 18-34, Black 18-34 (if Blacks aged six years and older comprise more than 10% of market) and Hispanic 18-34 (if Hispanics aged six years and older comprise more than 10% of market). Against these benchmarks across the 10 markets, Arbitron is:

- Meeting or exceeding 10 out of 10 (100%) of the Persons 18-34 DDI benchmarks
- Meeting or exceeding 8 out of 8 (100%) of the Black 18-34 DDI benchmarks
- Meeting or exceeding 8 out of 9 (89%) of the Hispanic 18-34 DDI benchmarks

The table below summarizes the DDI performance across the 10 markets for June 2008.

	Black 6+	Hispanic 6+	Spanish Dominant Hispanics 6+	Persons 18-34	Black 18-34	Hispanic 18-34
Philadelphia	129	**	**	101	112	**
Houston	119	106	116	99	94	112
New York (core)	108	143	140	98	86	132
Nassau-Suffolk	104	89	**	84	96	57
Middlesex	88	94	**	96	95	98
Los Angeles	112	121	125	96	96	99
Riverside	**	123	126	101	**	106
Chicago	120	128	138	93	90	118
San Francisco	100	119	141	86	76	127
San Jose	**	126	124	85	**	126

** DDI not reported due to low population percentage or lack of availability of population estimates.

Sample Proportionality

Another metric used to evaluate the performance of PPM panels is sample proportionality. Proportionality indexes the percentage of the sample versus the percentage of the population. Comparing June 2008 PPM performance to the last Diary survey (Winter 2007), which included all 10 currently deployed PPM markets:

- Young adult proportionality averages 85% in PPM versus 83% in the Diary
- Black proportionality averages 97% in PPM versus 91% in the Diary
- Hispanic proportionality in PPM averages 105% versus 91% in the Diary
- Spanish-dominant proportionality averages 119% in PPM versus 101% in the Diary

Attachment 5

Minority and Young Adult PPM™ Initiatives

Arbitron's PPM panels are representative of minorities and young adults. This has resulted from a variety of special procedures and initiatives aimed at gaining and maintaining the representation of these groups. Some key procedures and initiatives are listed below:

- Inclusion of cell-phone-only households
- Matching presence of young adults as sampling characteristic
 - Allows increased sampling rate for households containing young adults to improve their representation in the panel, while maintaining the statistical properties of random or probability sampling.
 - Presence of Persons 25-34 added in March 2008, in addition to presence of Persons 18-24.
- Larger than standard recruitment incentives for persons in Spanish-dominant Hispanic households
- Larger than standard anniversary bonuses for persons in young adult, Black and Spanish-dominant households
- Larger than standard weekly performance bonuses for persons in Spanish-dominant households
- Larger than standard weekly performance bonuses for persons in households with anyone 18-24 years-old

In addition to the above procedures, there are other initiatives that have been more recently deployed or are being tested (dates of implementation are given in parentheses). These include:

- Personalized panelist Web site (February 2008)
 - Provides panelist with daily performance feedback and an alternative way to communicate with Arbitron.
- Choice of Meter carrying accessories (February 2008)
 - Provides fun and stylish ways to more easily carry the Meter.
- In-person coaching for initially poor-performing young adults (March 2008)
 - Pilot test in four selected markets with preliminary results in August 2008.
- Reminder/wake-up call service (April 2008)
 - Pilot test in three selected markets, which enables panelists to set up reminder calls reminding panelists to carry their PPM devices, either through the panelist Web site or by telephone.
- Cell modems for cell-phone-only households (May 2008)
 - Rather than waiting for a landline installation, cell-phone-only households can begin their participation immediately by using the cell modem sent with their PPM equipment.
- Removable decals to personalize Meter (August 2008)

- The Meter decal booklet provides 24 different designs that can each be reused to allow panelists to personalize the look of their PPM devices.
- "Up-Front incentives and other early panel treatments (Early 2009)
 - A package of "up-front" treatments focused on the first 28 days a person is in the panel has initially shown positive impact on response rates. These treatments include a special cash bonus for good compliance during the first month after joining the panel, meter carrying accessories and decals, and positive reinforcement feedback for good compliance using thank you cards, gifts and follow-up calls. Implementation planning has begun in anticipation of continued positive results.

Standard Hispanic Procedures

To gain the trust of Spanish-dominant Hispanics and encourage them to participate in PPM surveys, it is critical that we speak to Spanish speakers in their primary language. For more than 30 years, Arbitron has utilized bilingual materials in its Diary service, and bilingual materials are employed in every stage of the PPM panel process.

- Bilingual pre-placement materials sent to addresses located in High-Density Hispanic Areas
- Bilingual interviewers call all sampled households located in High-Density Hispanic Areas (i.e., zip codes with high concentrations of Hispanic persons based on Census data).
 - Bilingual interviewers also call all sampled households located in other areas when the household has been identified as Spanish-speaking.
- Bilingual recruitment materials and ongoing panelist communications sent to all Hispanic households.
- Panelists choose their preferred language for the messages on the PPM recharger display screen.
- Spanish-dominant Hispanic panelists scheduled for coaching or other contacts are always called by bilingual Panel Relations Specialists.



Report on PPM Research Questions from Hispanic Radio Broadcasters

***(Questions Submitted by
Entravision, SBS and Univision Radio)***

**Prepared by:
Arbitron PPM Research Department
June 6, 2008**



Overview

Today's presentation responds to specific Hispanic broadcaster questions about PPM panels

Key highlights of the research to be covered today:

- » Hispanic Spanish-dominant persons are among the most compliant PPM panel members across all age groups.
- » Hispanic representation by Country of Origin and Cell-Phone-Only status appears to be good.
- » PPM panels provide robust and reliable sample sizes for Hispanic radio ratings.
- » PPM language questions and weighting procedures minimize bias potential and maximize ratings reliability.
- » Electronic measurement of exposure to Radio is consistent with the industry's audience ratings goals.

Among the planned panel, is our daily sample target high enough? Why do we only expect 75% of the installed base to participate on a given day and not 100%? Why have we set up a benchmark of 80% of the 75%, which means 60% of our installed panel contribute to the daily ratings? Why not strive for the full 75%?

Daily In-Tab Rates

PPM panels are “over-installed” by the expected margin required to yield the daily in-tab target.

The 75% daily in-tab estimate is a planning target, not a “cap”.

Based on survey research history, we don’t expect equal cooperation among all age groups . . .

But we are rapidly improving performance for P18-24.

In-tab rates are similar across race/ethnic groups, with Spanish-dominant Hispanics the highest group.

Spanish-Dominant Hispanics Have Highest In-Tab Rates – Including for P18-34

Average Daily In-Tab Rates by Age/Sex, Race/Ethnicity and Language
Total New York Metro, April 2008

	<i>Total Persons</i>	<i>Black</i>	<i>Hispanic</i>	<i>Hispanic Spanish</i>	<i>Hispanic English</i>	<i>Other</i>
Total 6+	78.3	75.9	77.3	82.3	72.9	79.2
Males 6+	78.9	75.5	78.2	83.5	73.6	79.8
Males 6-11	72.0	69.6	68.2	85.7	65.5	75.3
Males 12-17	72.0	66.2	72.0	80.2	69.6	74.0
Males 18-34	69.5	70.8	74.6	79.2	69.4	67.0
Males 35-54	81.7	79.2	82.8	84.8	80.5	81.8
Males 55+	86.2	82.8	84.7	87.8	80.4	87.0
Females 6+	77.7	76.1	76.6	81.3	72.4	78.5
Females 6-11	70.1	63.4	69.1	78.7	66.1	72.3
Females 12-17	67.3	60.0	66.2	78.3	63.3	70.6
Females 18-34	66.1	67.1	69.0	69.9	68.3	64.5
Females 35-54	82.1	82.3	83.3	83.5	83.0	81.7
Females 55+	84.9	81.9	87.1	89.9	81.5	85.2

Large Gains for P18-24 In-tab Rates are Narrowing the “Compliance Gap”

Total New York Metro

	<i>P6+ UE %</i>	<i>Oct. 2007</i>	<i>April 2008</i>	<i>Point Change</i>	<i>Percent Change</i>
<i>Total P6+</i>	100%	70.7%	78.3%	+7.6	+11%
<i>Black 6+</i>	17.7%	64.6%	75.9%	+11.3	+17%
<i>Hispanic 6+</i>	21.5%	68.3%	77.3%	+9.0	+13%
<i>P18-24</i>	9.6%	55.2%	67.7%	+12.5	+23%
<i>B18-24</i>	1.9%	50.8%	66.2%	+15.4	+30%
<i>H18-24</i>	2.9%	53.8%	72.7%	+18.9	+35%

***Do Hispanics carry the meter adequately and regularly
within discrete demographic cells?***

Hispanic Meter Compliance

Hispanic panelists, most notably Spanish-dominant persons, comply at levels equal to or higher than other race/ethnicity groups.

This pattern holds up across all age groups.

Other measures of cooperation such as meter out-of-dock and in-motion times also compare favorably.

Special tabulation of employment, income and education suggests no “Blue Collar” bias.

Spanish-Dominant Compliance is Highest

Average Daily Compliance Rates
Total New York Metro, April 2008

	<i>Total Persons</i>	<i>Black</i>	<i>Hispanic</i>	<i>Hispanic Spanish</i>	<i>Hispanic English</i>	<i>Other</i>
Total 6+	85.1	84.0	84.1	88.2	80.4	85.7
Males 6+	85.6	83.6	84.9	89.3	81.0	86.2
Males 6-11	80.9	80.8	78.0	95.5	75.1	82.8
Males 12-17	79.4	76.2	77.9	86.0	75.5	81.0
Males 18-34	78.0	80.1	82.1	85.6	78.1	75.6
Males 35-54	87.4	85.4	88.3	90.1	86.2	87.5
Males 55+	91.5	89.1	90.8	93.0	87.5	92.0
Females 6+	84.7	84.3	83.4	87.3	79.8	85.3
Females 6-11	76.7	76.1	76.1	85.5	73.2	77.1
Females 12-17	77.3	72.6	75.4	85.4	72.9	80.0
Females 18-34	75.6	76.9	77.8	78.9	77.1	74.2
Females 35-54	87.7	88.6	88.6	88.9	88.1	87.2
Females 55+	90.4	88.3	90.9	92.9	86.7	90.8